

**QUINN EMANUEL URQUHART & SULLIVAN, LLP**

Stephen A. Broome (CA Bar No. 314605)  
stephenbroome@quinnemanuel.com  
Viola Trebicka (CA Bar No. 269526)  
violatrebicka@quinnemanuel.com  
Crystal Nix-Hines (Bar No. 326971)  
crystalnixhines@quinnemanuel.com  
Rachael L. McCracken (Bar No. 252660)  
rachaelmccracken@quinnemanuel.com  
Alyssa G. Olson (CA Bar No. 305705)  
alyolson@quinnemanuel.com  
865 S. Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
Telephone: (213) 443-3000  
Facsimile: (213) 443-3100

Andrew H. Schapiro (admitted *pro hac vice*)  
andrewschapiro@quinnemanuel.com  
Teuta Fani (admitted *pro hac vice*)  
teutafani@quinnemanuel.com  
Joseph H. Margolies (admitted *pro hac vice*)  
josephmargolies@quinnemanuel.com  
191 N. Wacker Drive, Suite 2700  
Chicago, IL 60606  
Telephone: (312) 705-7400  
Facsimile: (312) 705-7401

Jomaire Crawford (admitted *pro hac vice*)  
jomairecrawford@quinnemanuel.com  
D. Seth Fortenbery (admitted *pro hac vice*)  
sethfortenbery@quinnemanuel.com  
51 Madison Avenue, 22nd Floor  
New York, NY 10010  
Telephone: (212) 849-7000  
Facsimile: (212) 849-7100

Xi ("Tracy") Gao (CA Bar No. 326266)  
tracygao@quinnemanuel.com  
Carl Spilly (admitted *pro hac vice*)  
carlspilly@quinnemanuel.com  
1300 I Street NW, Suite 900  
Washington D.C., 20005  
Telephone: (202) 538-8000  
Facsimile: (202) 538-8100

*Counsel for Defendant Google LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, *et al.*, individually and  
on behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JOSEPH H.  
MARGOLIES IN SUPPORT OF  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF PARTIES' PRETRIAL  
CONFERENCE STATEMENT (DKT.  
1028)**

Judge: Hon. Yvonne Gonzalez Rogers

1 I, Joseph H. Margolies, declare as follows:

2 1. I am an attorney with Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for  
3 Defendant Google LLC (“Google”) in this action. I am making this declaration pursuant to Civil  
4 Local Rule 79-5(e)–(f) as an attorney for Google as the Designating Party, pursuant to Civil Local  
5 Rule 79-5(f)(3) in response to Dkt. 1028.

6 2. On October 17, 2023, Plaintiffs filed their Administrative Motion to Seal Portions of  
7 Parties’ Pretrial Conference Statement (Dkt. 1028) (“Pretrial Statement”). On October 17, 2023, I  
8 obtained an unredacted copy of the document sought to be sealed.

9 3. I have reviewed the documents that Plaintiffs moved to file under seal pursuant to  
10 Civil Local Rule 79-5(f). Based on my review, there is good cause to seal the following:

| Document(s) to be Sealed   | Basis for Sealing   |
|--|---|
| <p>11 Exhibit 1 – Pretrial Conference Statement</p> <p>12</p> <p>13 Pages 1:15, 3:2–4, 3:6–7, 3:18,</p> <p>14 3:20–22, 4:18–20, 14:7, 14:18–19,</p> <p>15 14:21–27, 15:1, 16:26–27, 17:10,</p> <p>16 18:4, 18:6–7, 18:9, 18:12–13,</p> <p>17 18:15–16, 20:17–18, 29:22, 30:1,</p> <p>18 30:4, 55:4, 55:22, 61:14, 63:8,</p> <p>19 64:1, 64:3, 65:4</p> | <p>20 The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including Google’s internal projects, data fields, and logs, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.</p> |

23 4. Google’s request is narrowly tailored in order to protect its confidential information.  
24 These redactions are limited in scope and volume. Because the proposed redactions are narrowly  
25 tailored and limited to portions containing Google’s highly confidential or confidential information,  
26 Google requests that the portions of the aforementioned documents be redacted from any public  
27 version of those documents.  
28

1           5.       Google does not seek to redact or file under seal any portions of the Pretrial Statement  
2 not indicated in the table above.

3           I declare under penalty of perjury of the laws of the United States that the foregoing is true  
4 and correct. Executed in Bayside, Wisconsin on October 24, 2023.

5  
6  
7                               By           /s/ Joseph H. Margolies            
8                               Joseph H. Margolies  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28